

# Charles George Land Reclamation Trust Landfill

NPL Site  
Administrative Record  
(As supplemented pursuant to the  
February 26, 1990 Order on Remand)

ROD II Signed: July 11, 1985

## Index

Prepared for  
  
Region I  
Waste Management Division  
U.S. Environmental Protection Agency

With Assistance from  
  
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## Introduction

This section is the Index to the Administrative Record for Operable Unit II of the Charles George Land Reclamation Trust Landfill National Priorities List (NPL) site. Guidance documents used by EPA staff in selecting response actions at the site are listed at the end of the Administrative Record Index.

The Administrative Record for the Charles George Land Reclamation Trust Landfill NPL site which EPA has certified to the Federal District Court on October 1, 1990 as complete includes the original Administrative Record for this site dated September 29, 1988 and the Supplemented Administrative Record for this site dated October 1, 1990. This Supplemented Administrative Record was compiled by EPA pursuant to the February 26, 1990 Order on Remand.

In addition to this Administrative Record certified and submitted to the court, the defendants have requested and the court has allowed certain other documents to be treated as part of the record. These additional materials, which EPA did not primarily rely on in selecting the remedy for the Charles George Landfill, are comprised of those documents which Original Defendants and New Defendants requested to be included by their written comments submitted to EPA on August 3, 1990. (See Record of Decision [ROD] II Administrative Record Index as Supplemented Pursuant to the February 26, 1990 Order on Remand, Section 5.4.)

The Administrative Record is available for public review at EPA Region I's Office in Boston, Massachusetts, and at the Littlefield Public Library, Tyngsborough, Massachusetts 01879. *This Administrative Record includes, by reference only, all documents included in the Administrative Record for the December 29, 1983 ROD for this NPL Site.* Questions concerning the Administrative Record should be addressed to the EPA Region I site manager.

The Administrative Record is required by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA).

To facilitate understanding of the site, the three "operable units" or project phases for the site are defined as follows:

- Operable Unit I: The planning, design and construction of a new, permanent waterline serving the Cannongate Condominiums and surrounding area.
- Operable Unit II: The planning, design and construction of a landfill cap and appurtenant systems.
- Operable Unit III: The planning, design and construction of clean-up actions to remediate "off-site" contamination, including the treatment of collected leachate.

**ADMINISTRATIVE RECORD INDEX**  
**for the**  
**Charles George Land Reclamation Trust Landfill NPL Site**  
**(Operable Unit II)**

3.0 Remedial Investigation (RI)

3.1 Correspondence

1. Letter from Anthony D. Cortese, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Michael R. Deland, EPA Region I (August 23, 1983).
2. Letter from John A. George, NUS Corporation to Richard Leighton, EPA Region I (August 2, 1984).

3.2 Sampling and Analysis Data

*The Sampling and Analysis Data for the Remedial Investigation (RI) may be reviewed, by appointment only, through EPA Region I, Boston, Massachusetts. See Section 3.2.1.*

3.4 Interim Deliverables

1. "Draft - General Health and Safety Requirements," NUS Corporation (July 1984).

3.5 Applicable or Relevant and Appropriate Requirements (ARARs)

1. Memorandum from Margaret Leshen, EPA Region I to Richard Leighton, EPA Region I (August 22, 1985).

3.7 Work Plans and Progress Reports

1. "Work Plan - Remedial Investigation/Feasibility Study of Alternatives," NUS Corporation (March 1984).
2. "Draft - Site-Specific Quality Assurance Plan," NUS Corporation (July 1984).
3. "Project Operations Plan for Leachate and Ambient Air Sampling," Camp Dresser & McKee Inc. (May 16, 1985). *See Section 3.7.1 for details.*

4.0 Feasibility Study (FS)

4.1 Correspondence

1. Letter from Craig E. Blake, Camp Dresser & McKee Inc. to Richard Leighton, EPA Region I (May 29, 1985).
2. Letter from Craig E. Blake, Camp Dresser & McKee Inc. to Richard Leighton, EPA Region I (June 12, 1985).
3. Letter from Merrill S. Hohman, EPA Region I to Gerald St. Hilaire, Commonwealth of Massachusetts Executive Office of Communities and Development (June 24, 1985).
4. Letter from Stanley L. Carlock, U.S. Army Corps of Engineers to Craig E. Blake, Camp Dresser & McKee Inc. (July 1, 1985).
5. NUS Corporation Notes to File. Concerning Cap Designs.

## 4.2 Sampling and Analysis Data

*The Sampling and Analysis Data for the Feasibility Study (FS) may be reviewed, by appointment only, through EPA Region I, Boston, Massachusetts.*

## 4.6 Feasibility Study (FS) Reports

### Reports

1. "Draft - Source-Oriented Feasibility Study," NUS Corporation (March 1985).
2. "Final - Source-Oriented Feasibility Study," NUS Corporation (November 1985).

### Comments

3. Comments Dated April 4, 1985 from Neil Robinson and Kathleen Robinson on the March 1985 "Draft - Source-Oriented Feasibility Study," NUS Corporation.
4. Comments Dated April 11, 1985 from Gilbert Ohnesorge on the March 1985 "Draft - Source-Oriented Feasibility Study," NUS Corporation.
5. Comments Dated April 14, 1985 from Artie Jackson on the March 1985 "Draft - Source-Oriented Feasibility Study," NUS Corporation.
6. Comments Dated April 16, 1985 from Lynne Jackson on the March 1985 "Draft - Source-Oriented Feasibility Study," NUS Corporation.
7. Comments Dated April 17, 1985 from Paul Dinneen, Dana E. Metzler, and David E. Tully, Town of Dunstable Board of Health on the March 1985 "Draft - Source-Oriented Feasibility Study," NUS Corporation.
8. Comments Dated April 18, 1985 from Bernard R. Sheehan on the March 1985 "Draft - Source-Oriented Feasibility Study," NUS Corporation.
9. Comments Dated April 19, 1985 from Elizabeth Coughlin, Flint Analytical Service on the March 1985 "Draft - Source-Oriented Feasibility Study," NUS Corporation.
10. Comments Dated April 22, 1985 from Stanley L. Carlock, U.S. Army Corps of Engineers on the March 1985 "Draft - Source-Oriented Feasibility Study," NUS Corporation.
11. Comments Dated May 17, 1985 from William F. Cass, Commonwealth of Massachusetts Department of Environmental Quality Engineering on the March 1985 "Draft - Source-Oriented Feasibility Study," NUS Corporation.
12. Comments from Clara Chow, Tom D'Avanzo, David Lang, Margaret McDonough, and Eric Hall, EPA Region I on the March 1985 "Draft - Source-Oriented Feasibility Study," NUS Corporation.
13. Air Management Division Comments Compiled by Linda Holden-Johnson, EPA Region I on the March 1985 "Draft - Source-Oriented Feasibility Study," NUS Corporation.
14. Comments from Linda Holden-Johnson, EPA Region I on the August 1985 "Source-Oriented Feasibility Study," NUS Corporation.

## 4.7 Work Plans and Progress Reports

1. "Work Plan - Part II - Feasibility Study/RCRA Post Closure Work Plan," EBASCO Services, Inc. (April 1987).

## 5.0 Record of Decision (ROD)

### 5.3 Responsiveness Summaries

1. Cross Reference: Responsiveness Summary is Appendix 3 of the Record of Decision [Filed and cited as entry number 1 in 5.4 Record of Decision (ROD)].

### 5.4 Record of Decision (ROD)

#### Reports

1. "Record of Decision - Remedial Alternative Selection," with Attached Distribution List, EPA Region I (July 11, 1985).

#### Comments

2. Letter from General Electric Company, The Gillette Company, Polaroid Corporation, and SCA Chemical Services (MA) Inc., Company to John Gallagher, EPA Region I (December 19, 1985) with attached Comments Dated December 19, 1985 from Geraghty & Miller and Blasland & Bouck Engineers on the July 11, 1985 "Record of Decision - Remedial Alternative Selection," EPA Region I.
3. Comments Dated April 22, 1986 from the Cannongate II Condominium Association on the July 11, 1985 "Record of Decision - Remedial Alternative Selection," EPA Region I.

## 6.0 Remedial Design (RD)

### 6.1 Correspondence

1. Letter from Gilbert T. Joly, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Anthony Lally, M. Anthony Lally Associates (April 28, 1982).
2. Letter from John A. George, NUS Corporation to Nancy Piligian, EPA Region I (November 15, 1984).
3. Memorandum from Craig E. Blake, Camp Dresser & McKee Inc. to TRC Participants (June 24, 1985).
4. Memorandum from Craig E. Blake, Camp Dresser & McKee Inc. to Richard Leighton, EPA Region I (June 25, 1985).
5. Meeting Notes, Charles George Site Management Team, EPA Region I and Camp Dresser & McKee Inc. (June 27, 1985).
6. Letter from Craig E. Blake, Camp Dresser & McKee Inc. to Randal K. Petersen, U.S. Army Corps of Engineers (July 16, 1985).
7. Letter from Craig E. Blake, Camp Dresser & McKee Inc. to Richard Leighton, EPA Region I (August 20, 1985).
8. Memorandum from Stephen P. Farrick, EPA Region I to File (January 22, 1986).
9. Letter from Margaret Leshen, EPA Region I to Ronald Hill, EPA (January 28, 1986).
10. Telephone Notes Between Margaret Leshen, EPA Region I and Eugene Harris, EPA Headquarters (February 28, 1986).
11. Letter from Roger P. Thibault, Camp Dresser & McKee Inc. to Steven P. Farrick, EPA Region I (March 19, 1986).
12. Memorandum from Steven P. Farrick, EPA Region I to the Charles George Site Management Team (April 2, 1986).
13. Memorandum from EPA Region I to File (April 7, 1986).

## 6.1 Correspondence (cont'd.)

14. Telephone Notes Between Steven P. Farrick, EPA Region I and Roger P. Thibault, Camp Dresser & McKee Inc. (April 17, 1986).
15. Letter from Steven P. Farrick, EPA Region I to Roger P. Thibault, Camp Dresser & McKee Inc. (April 23, 1986).
16. Telephone Notes Between Steven P. Farrick, EPA Region I and Roger P. Thibault, Camp Dresser & McKee Inc. (April 29, 1986).
17. Memorandum from Steven P. Farrick, EPA Region I to the Charles George Site Management Team (May 2, 1986).
18. Telephone Notes Between Steven P. Farrick, EPA Region I and Roger P. Thibault, Camp Dresser & McKee Inc. (May 16, 1986).
19. Memorandum from Steven P. Farrick, EPA Region I to the Charles George Site Management Team (May 19, 1986).
20. Letter from Stanley L. Carlock, U.S. Army Corps of Engineers to Steven P. Farrick, EPA Region I (May 20, 1986).
21. Telephone Notes Between Steven P. Farrick, EPA Region I and Roger P. Thibault, Camp Dresser & McKee Inc. (June 4, 1986).
22. Letter from Roger P. Thibault, Camp Dresser & McKee Inc. to Steven P. Farrick, EPA Region I (June 13, 1986).
23. Memorandum from Steven P. Farrick, EPA Region I to the Charles George Site Management Team (June 16, 1986).
24. Telephone Notes Between Steven P. Farrick, EPA Region I and Roger P. Thibault, Camp Dresser & McKee Inc. (June 17, 1986).
25. Memorandum from Steven P. Farrick, EPA Region I to Roger P. Thibault, Camp Dresser & McKee Inc. (June 17, 1986).
26. Telephone Notes Between Steven P. Farrick, EPA Region I and Randal K. Petersen, U.S. Army Corps of Engineers (June 24, 1986).
27. EPA Region I Attendance List, Meeting with U.S. Army Corps of Engineers and Camp Dresser & McKee Inc. (June 26, 1986).
28. Letter from Madeline Snow, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Heather M. Ford, EPA Region I (July 8, 1986).
29. Memorandum from Steven P. Farrick, EPA Region I to the Charles George Site Management Team (July 21, 1986).
30. Meeting Notes, Charles George Site Management Team, EPA Region I (July 23, 1986).
31. Letter from Heather M. Ford, EPA Region I to Madeline Snow, Commonwealth of Massachusetts Department of Environmental Quality Engineering (July 24, 1986).
32. Telephone Notes Between Steven P. Farrick, EPA Region I and Robert Bois, Commonwealth of Massachusetts Department of Environmental Quality Engineering (July 24, 1986).
33. Memorandum from Stanley L. Carlock, U.S. Army Corps of Engineers to the Commander, U.S. Army Corps of Engineers (July 28, 1986).
34. Telephone Notes Between Steven P. Farrick, EPA Region I and Robert Bois, Commonwealth of Massachusetts Department of Environmental Quality Engineering (July 29, 1986).
35. Memorandum from Steven P. Farrick, EPA Region I to the Charles George Site Management Team (July 29, 1986).
36. Letter from Heather M. Ford, EPA Region I to Madeline Snow, Commonwealth of Massachusetts Department of Environmental Quality Engineering (August 4, 1986).
37. Telephone Notes Between Steven P. Farrick, EPA Region I and Randal K. Petersen, U.S. Army Corps of Engineers (August 6, 1986).

## 6.1 Correspondence (cont'd.)

38. Telephone Notes Between Steven P. Farrick, EPA Region I; Randal K. Petersen, U.S. Army Corps of Engineers; and Maurice Beaudoin, U.S. Army Corps of Engineers (September 2, 1986).
39. Letter from Roger P. Thibault, Camp Dresser & McKee, Inc. to Stanley L. Carlock, U.S. Army Corps of Engineers (September 3, 1986).
40. Memorandum from Steven P. Farrick, EPA Region I to File (September 4, 1986).
41. Memorandum from EPA Region I to File (September 11, 1986).
42. Memorandum from EPA Region I to File (September 26, 1986).
43. Memorandum from EPA Region I to File (October 8, 1986).
44. Letter from Stanley L. Carlock, U.S. Army Corps of Engineers to Steven P. Farrick, EPA Region I (October 10, 1986).
45. Letter from John J. Josti, Camp Dresser & McKee Inc. to Steven P. Farrick, EPA Region I (October 16, 1986).
46. "Report Memo on Air Sampling," Camp Dresser & McKee Inc. (October 21, 1986). *For security report see 3.1.3*
47. Memorandum from EPA Region I to File (October 24, 1986).
48. Letter from William F. Cass, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Merrill S. Hohman, EPA Region I (November 6, 1986).
49. Letter from Steven P. Farrick, EPA Region I to Stanley L. Carlock, U.S. Army Corps of Engineers (November 10, 1986).
50. Letter from John J. Josti, Camp Dresser & McKee Inc. to Steven P. Farrick, EPA Region I (November 15, 1986).
51. Letter from Kevin J. Oates, EPA Region II to Steven P. Farrick, EPA Region I (November 18, 1986).
52. Letter from Steven P. Farrick, EPA Region I to Dale Young, Commonwealth of Massachusetts Department of Environmental Quality Engineering (November 19, 1986).
53. Letter from Steven P. Farrick, EPA Region I to Stanley L. Carlock, U.S. Army Corps of Engineers (November 19, 1986).
54. Memorandum from Michael Duchesneau, Camp Dresser & McKee Inc. to John J. Josti, Camp Dresser & McKee Inc. (November 25, 1986).
55. Letter from John J. Josti, Camp Dresser & McKee Inc. to Steven P. Farrick, EPA Region I (December 1, 1986).
56. Letter from Jack Hoar, Camp Dresser & McKee Inc. to Steven P. Farrick, EPA Region I (December 9, 1986).
57. Letter from Steven P. Farrick, EPA Region I to John J. Josti, Camp Dresser & McKee Inc. (December 11, 1986).
58. Letter from Stanley L. Carlock, U.S. Army Corps of Engineers to Steven P. Farrick, EPA Region I (January 12, 1987).
59. Memorandum from Steven P. Farrick, EPA Region I to File (January 23, 1987).
60. Letter from Steven P. Farrick, EPA Region I to Del W. Connealy, U.S. Army Corps of Engineers (January 26, 1987).
61. Memorandum from Steven P. Farrick, EPA Region I to Heather M. Ford, EPA Region I (March 7, 1987).
62. Memorandum from Camp Dresser & McKee Inc. to File (March 19, 1987).
63. Letter from Steven P. Farrick, EPA Region I to Robert P. Hartley, EPA Headquarters (March 25, 1987).
64. Letter from Robert P. Hartley, EPA Headquarters to Steven P. Farrick, EPA Region I (April 13, 1987).
65. Letter from Steven P. Farrick, EPA Region I to Dale C. Young, Commonwealth of Massachusetts Department of Environmental Quality Engineering (May 12, 1987).

## 6.1 Correspondence (cont'd.)

66. Memorandum from Jack Hoar, Camp Dresser & McKee, Inc. to Steven P. Farrick, EPA Region I (May 19, 1987).
67. Letter from Steven P. Farrick, EPA Region I to Dale C. Young, Commonwealth of Massachusetts Department of Environmental Quality Engineering (June 1, 1987).
68. Letter from Dale C. Young, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Steven P. Farrick, EPA Region I (August 7, 1987).
69. Letter from Steven P. Farrick, EPA Region I to Dale C. Young, Commonwealth of Massachusetts Department of Environmental Quality Engineering (August 31, 1987).
70. Letter from Steven P. Farrick, EPA Region I to Dale C. Young, Commonwealth of Massachusetts Department of Environmental Quality Engineering (September 2, 1987).
71. Telephone Notes Between Stephen Joyce, EPA Region I and Bob Zaruba, U.S. Army Corps of Engineers (November 3, 1987).
72. Telephone Notes Between Stephen Joyce, EPA Region I and John J. Josti, Camp Dresser & McKee Inc. (November 12, 1987).
73. Telephone Notes Between Stephen Joyce, EPA Region I and John J. Josti, Camp Dresser & McKee Inc. (November 23, 1987).
74. Telephone Notes Between Stephen Joyce, EPA Region I and John J. Josti, Camp Dresser & McKee Inc. (December 3, 1987).
75. Memorandum from EPA Region I to File Concerning Source Control Design Review.

## 6.2 Sampling and Analysis Data

*The Sampling and Analysis Data for the Remedial Design may be reviewed, by appointment only, through EPA Region I, Boston, Massachusetts.*

## 6.4 Remedial Design Documents

## Reports

1. "Conceptual Design Review Package," Camp Dresser & McKee Inc. (July 2, 1985).
2. "Draft - Preliminary Design Analysis Submittal - Computations - Remedial Design," Camp Dresser & McKee Inc. (May 1986).
3. "Draft - Documentation of Similar Installation Technical Memorandum," Camp Dresser & McKee Inc. (October 15, 1986).
4. "Draft - Documentation of Engineering Decisions Design Memo," Camp Dresser & McKee Inc. (October 15, 1986).
5. "Study Issues Report," Camp Dresser & McKee Inc. (November 15, 1986).
6. "Final Design Analysis Revisions - Appendix E - Remedial Design," Camp Dresser & McKee Inc. (December 17, 1986).
7. "Final Design Analysis Revisions - Appendix F - Surface Drainage - Remedial Design," Camp Dresser & McKee Inc. (February 25, 1987).
8. Letter Report "Surface Water Drainage - Impact on Public Road Culverts," Camp Dresser & McKee Inc. (February 25, 1987).
9. "Draft - Final Design Analysis - Remedial Design," Camp Dresser & McKee Inc. for the U.S. Army Corps of Engineers.
10. "Landfill Subsidence: Estimated Amount and Effect on HDPE - Durability Technical Memorandum," Camp Dresser & McKee Inc.



#### 6.4 Remedial Design Documents (cont'd.)

##### Comments

11. Comments Dated June 2, 1986 from the U.S. Army Corps of Engineers on draft plans and specifications.

#### 6.6 Work Plans and Progress Reports

1. "Draft - Work Plan for Technical Assistance - Volume I," Camp Dresser & McKee Inc. (April 1985).

#### 7.0 Remedial Action (RA)

##### 7.2 Sampling and Analysis Data

*The Sampling and Analysis Data for the Remedial Action may be reviewed, by appointment only, through EPA Region I, Boston, Massachusetts.*

##### 7.4 Applicable or Relevant and Appropriate Requirements (ARARs)

1. "Certificate of the Secretary of Environmental Affairs on the Environmental Notification Form and Special Procedure for Major and Complicated Project," Commonwealth of Massachusetts Executive Office of Environmental Affairs (March 26, 1986).
2. Certificate of the Secretary of Environmental Affairs on the Environmental Notification Form," Commonwealth of Massachusetts Executive Office of Environmental Affairs (March 26, 1986).
3. "Street Opening Bylaws," Town of Tyngsborough.
4. "40 CFR Part 4 Subpart F - Acquisition of Real Property."

##### 7.5 Remedial Action Documents

1. "Appraisal Report - Acquisition - Parcels: D, E, N, F," The Beal Companies for Camp Dresser & McKee Inc. (March 1987).
2. "Recommended Description for Parcel 'D'," Camp Dresser & McKee Inc. (March 12, 1987).
3. Letter from George O. Van Hazinga and Raymond A. Dennehy III, The Foster Company to John J. Josti, Camp Dresser & McKee Inc. (March 12, 1987).
4. Letter from George O. Van Hazinga and Raymond A. Dennehy III, The Foster Company to John J. Josti, Camp Dresser & McKee Inc. (March 12, 1987).
5. Letter from George O. Van Hazinga and Raymond A. Dennehy III, The Foster Company to John J. Josti, Camp Dresser & McKee Inc. (March 12, 1987).
6. "Appraisal Report - Parcel 'D'," R.M. Bradley & Co., Inc. for Camp Dresser & McKee Inc. (March 16, 1987).
7. "Appraisal Report - Parcel 'E' and Parcel 'N'," R.M. Bradley & Co., Inc. for Camp Dresser & McKee Inc. (March 16, 1987).
8. "Appraisal Report - Parcel 'F'," R.M. Bradley & Co., Inc. for Camp Dresser & McKee Inc. (March 16, 1987).

## 8.0 Site Closeout

### 8.3 Operations and Maintenance

#### Reports

1. "Preliminary - Operations and Maintenance Plan for Post Closure Period," Camp Dresser & McKee Inc. (December 1986).

#### Comments

2. Comments Dated May 7, 1987 from Dale C. Young, Commonwealth of Massachusetts Department of Environmental Quality Engineering on the December 1986 "Preliminary - Operations and Maintenance Plan for Post Closure Period," Camp Dresser & McKee Inc.

## 9.0 State Coordination

### 9.3 State Contracts

1. "Superfund State Contract Between the Commonwealth of Massachusetts and the U.S. Environmental Protection Agency for Remedial Action" (July 30, 1987).
2. "Amendment #1 to the State Superfund Contract Between the Commonwealth of Massachusetts and the U.S. Environmental Protection Agency for Remedial Action" (May 13, 1988).

## 11.0 Potentially Responsible Party (PRP)

### 11.7 PRP Steering Committee Documents

1. Letter from Susan M. Cooke, Goodwin, Procter & Hoar for the PRP Steering Committee to Jamie W. Katz, EPA Region I (May 16, 1986).
2. Letter from Steve J. Poulos, Geotechnical Engineers Inc. to John Gatlin, The Gillette Company (June 4, 1986).
3. "Cap for Charles George Site," Geotechnical Engineers Inc. for The Gillette Company (July 31, 1986).
4. "Settlement of Landfills," Geotechnical Engineers Inc. for the PRP Steering Committee (March 16, 1987).
5. Letter from Michael P. Last, Gaston Snow & Ely Bartlett for the PRP Steering Committee to Jamie W. Katz, EPA Region I (April 7, 1987).
6. Memorandum from Steven P. Farrick, EPA Region I to File (June 2, 1987).
7. Letter from Daniel H. Squire, Skadden, Arps, Slate, Meagher & Flom for the PRP Steering Committee to Jamie W. Katz, EPA Region I (July 6, 1987) with attached Letter from Steve J. Poulos, Geotechnical Engineers Inc. to Susan M. Cooke, Goodwin, Procter & Hoar for the PRP Steering Committee (June 12, 1987).
8. Letter from Jamie W. Katz, EPA Region I to Stephen Wald, Craig & Macauley and Bruce F. Smith, Jager, Smith & Stetler for the Charles George Land Reclamation Trust (October 6, 1987).
9. Letter from William F. Macauley, Craig & Macauley for the Charles George Land Reclamation Trust to Susana Cortina de Cardenas, EPA Region I (November 4, 1987).
10. Letter from Susan M. Cooke, Goodwin, Procter & Hoar for the PRP Steering Committee to Susana Cortina de Cardenas, EPA Region I (May 16, 1988).

### 11.7 PRP Steering Committee Documents (cont'd.)

11. Letter from Susan M. Cooke, Goodwin, Procter & Hoar for the PRP Steering Committee to Susana Cortina de Cardenas, EPA Region I (June 21, 1988).
12. Letter from Michael P. Last, Gaston & Snow for the PRP Steering Committee to Susana Cortina de Cardenas, EPA Region I (July 28, 1988) with attachments.
13. Letter from Susana Cortina de Cardenas, EPA Region I to Susan M. Cook, Goodwin, Procter & Hoar for the PRP Steering Committee (August 5, 1988).

### 13.0 Community Relations

#### 13.1 Correspondence

1. Letter from Rosemarie Henson, Town of Dunstable Board of Selectmen to Evelyn Sullivan, EPA Region I (November 28, 1984).
2. Letter from Susan J. Pelletier to Linda Holden-Johnson, EPA Region I (June 16, 1985).
3. "Certificate of the Secretary of Environmental Affairs Establishing a Special Procedure for a Major and Complicated Project," Commonwealth of Massachusetts Executive Office of Environmental Affairs (March 26, 1986).
4. Letter from Erin Battistelli, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Robert Clarke and Blanche Clarke (March 31, 1987).
5. Letter from Erin Battistelli, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Interested Parties (June 1987).

#### 13.2 Community Relations Plans

1. "Final - Revised Community Relations Plan," EBASCO Services, Inc. (August 1987).

#### 13.4 Public Meetings

1. Transcript, Public Meeting (April 16, 1985).
2. Meeting Notice, Commonwealth of Massachusetts Department of Environmental Quality Engineering (April 29, 1987).
3. Meeting Notes, EPA Region I, Commonwealth of Massachusetts Department of Environmental Quality Engineering, Citizens Advisory Committee, E.C. Jordan, Co. and EBASCO Services, Inc. (April 29, 1987).
4. Meeting Notice, Commonwealth of Massachusetts Department of Environmental Quality Engineering (May 13, 1987).
5. Meeting Notes, EPA Region I, Commonwealth of Massachusetts Department of Environmental Quality Engineering, Citizens Advisory Committee, and EBASCO Services, Inc. (May 13, 1987).
6. Meeting Notice, Commonwealth of Massachusetts Department of Environmental Quality Engineering (May 27, 1987).
7. Meeting Notes, EPA Region I, Commonwealth of Massachusetts Department of Environmental Quality Engineering, and Citizens Advisory Committee (May 27, 1987).
8. Meeting Notice, Commonwealth of Massachusetts Department of Environmental Quality Engineering (June 10, 1987).
9. Meeting Notes, EPA Region I, Commonwealth of Massachusetts Department of Environmental Quality Engineering, and Citizens Advisory Committee (June 10, 1987).

#### 13.4 Public Meetings (cont'd.)

10. Memorandum from Erin Battistelli, Commonwealth of Massachusetts Department of Environmental Quality Engineering to Steven P. Farrick and Geoff McKean, EPA Region I and Brian Magee, E. C. Jordan (June 18, 1987).
11. Meeting Notes, EPA Region I, Commonwealth of Massachusetts Department of Environmental Quality Engineering, Citizens Advisory Committee, and E.C. Jordan, Co. (July 1, 1987).
12. Meeting Notice, Commonwealth of Massachusetts Department of Environmental Quality Engineering (July 22, 1987).
13. Meeting Notice, Commonwealth of Massachusetts Department of Environmental Quality Engineering (August 12, 1987).
14. Meeting Notes, EPA Region I, Commonwealth of Massachusetts Department of Environmental Quality Engineering, and Citizens Advisory Committee (August 12, 1987).
15. Meeting Notice, Commonwealth of Massachusetts Department of Environmental Quality Engineering (September 9, 1987).
16. Meeting Notice, Commonwealth of Massachusetts Department of Environmental Quality Engineering (September 23, 1987).
17. Meeting Notes, EPA Region I, Commonwealth of Massachusetts Department of Environmental Quality Engineering, and Citizens Advisory Committee (September 23, 1987).
18. Meeting Notice, Commonwealth of Massachusetts Department of Environmental Quality Engineering (October 7, 1987).
19. Meeting Notice, Commonwealth of Massachusetts Department of Environmental Quality Engineering (October 28, 1987).
20. Meeting Notice, Commonwealth of Massachusetts Department of Environmental Quality Engineering (November 18, 1987).

#### 13.5 Fact Sheets

1. "Plans for Remedial Investigation and Feasibility Study," EPA Region I (May 1984).
2. "EPA Progress and Plans," EPA Region I (November 1984).
3. "Source-Control Feasibility Study Summary," EPA Region I (March 1985).
4. "Superfund Program Fact Sheet," EPA Region I (March 1988).

#### 16.0 Natural Resource Trustee

##### 16.1 Correspondence

1. Letter from Sharon Christopherson, U.S. Department of Commerce National Oceanic and Atmospheric Administration to Steven P. Farrick, EPA Region I (December 17, 1986).
2. Memorandum from Michael H. Frimpter, U.S. Army Corps of Engineers to William Patterson, U.S. Department of the Interior (March 13, 1987).

#### 17.0 Site Management Records

##### 17.2 Access Records

1. Letter from Merrill S. Hohman, EPA Region I to "Unknown Owners" (May 22, 1984).
2. Letter from Merrill S. Hohman, EPA Region I to Robert Bergeron and Catherine Bergeron (May 23, 1984).

## 17.2 Access Records (cont'd.)

3. Letter from Merrill S. Hohman, EPA Region I to Steven M. Brox and Frank A. Brox, Brox Realty Trust (May 23, 1984).
4. Letter from Merrill S. Hohman, EPA Region I to Mr. & Mrs. Egan (May 23, 1984).
5. Letter from Merrill S. Hohman, EPA Region I to Mr. & Mrs. Faye (May 23, 1984).
6. Letter from Merrill S. Hohman, EPA Region I to Earl H. Hunter (May 23, 1984).
7. Letter from Merrill S. Hohman, EPA Region I to Earl H. Hunter and Blanche L. Clarke (May 23, 1984).
8. Letter from Merrill S. Hohman, EPA Region I to E. Allen Larter and Margaret Larter (May 23, 1984).
9. Letter from Merrill S. Hohman, EPA Region I to Donald E. Lord and Margaret A. Lord (May 23, 1984).
10. Letter from Merrill S. Hohman, EPA Region I to Mr. & Mrs. Madden (May 23, 1984).
11. Letter from Merrill S. Hohman, EPA Region I to Sister Katherine Lawrence, Notre Dame Academy (May 23, 1984).
12. Letter from Merrill S. Hohman, EPA Region I to Piconics Inc. (May 23, 1984).
13. Letter from Merrill S. Hohman, EPA Region I to James Shaw and Mary Shaw (May 23, 1984).
14. Letter from Merrill S. Hohman, EPA Region I to Izadore Valcourt and Ruth Valcourt (May 23, 1984).
15. Letter from Merrill S. Hohman, EPA Region I to Izadore Weisburg and Ethyl Weisburg (May 23, 1984).
16. Letter from Stephen Slenker, Piconics Inc. to Merrill S. Hohman, EPA Region I (May 24, 1984).
17. Letter from Merrill S. Hohman, EPA Region I to Charles Allen and Patricia Allen (May 24, 1984).
18. Letter from Merrill S. Hohman, EPA Region I to Charles George Sr. and James George, Charles George Land Reclamation Trust (May 24, 1984).
19. Letter from Merrill S. Hohman, EPA Region I to David Clark and Helen Clark, (May 24, 1984).
20. Letter from Merrill S. Hohman, EPA Region I to Guy Constantine (May 24, 1984).
21. Letter from Merrill S. Hohman, EPA Region I to Dorothy George (May 24, 1984).
22. Letter from Merrill S. Hohman, EPA Region I to Mr. & Mrs. Gerow (May 24, 1984).
23. Letter from Merrill S. Hohman, EPA Region I to Dorothy Lacerte, Hunter Realty Trust (May 24, 1984).
24. Letter from Merrill S. Hohman, EPA Region I to Robert C. Roche and Gloria D. Roche (May 24, 1984).
25. Letter from Merrill S. Hohman, EPA Region I to Kenneth Greenwood and Mary Anne Greenwood (May 26, 1984).
26. Letter from Merrill S. Hohman, EPA Region I to Jerry Kloucek and Irene Kloucek (May 26, 1984).
27. Letter from Merrill S. Hohman, EPA Region I to Raymond F. Wilkins and Daisy M. Wilkins (June 1, 1984).
28. Letter from Merrill S. Hohman, EPA Region I to Mr. & Mrs. Hamon (June 5, 1984).
29. Letter from Merrill S. Hohman, EPA Region I to William F. Cass, Commonwealth of Massachusetts Department of Environmental Quality Engineering (September 15, 1986).

17.2 Access Records (cont'd.)

30. "Access and Acquisition of Property," EPA Headquarters (July 21, 1987).
31. Letter from Jamie W. Katz, EPA Region I to Joseph McGovern, U.S. Department of Justice and Margaret E. Sheehan, Commonwealth of Massachusetts Department of the Attorney General (August 17, 1987).
32. Telephone Notes Between Steven Joyce, EPA Region I and Susana Cortina de Cardenas, EPA Region I (December 16, 1987).
33. Letter from Merrill S. Hohman, EPA Region I to Brox Development Corporation.
34. Letter from Merrill S. Hohman, EPA Region I to Cannongate Condominium Owners.
35. Letter from Merrill S. Hohman, EPA Region I to Francis Carter and Freda Carter.
36. Letter from Merrill S. Hohman, EPA Region I to James C. George, Charles George Land Reclamation Trust.
37. Letter from Merrill S. Hohman, EPA Region I to Arthur Constantine and Claire Constantine.
38. Letter from Merrill S. Hohman, EPA Region I to Joseph Elkareh and Mary Elkareh.
39. Letter from Merrill S. Hohman, EPA Region I to Norma Japp.

**ADMINISTRATIVE RECORD INDEX AS SUPPLEMENTED PURSUANT  
TO THE FEBRUARY 26, 1990 ORDER ON REMAND**

**for the**

**Charles George Land Reclamation Trust Landfill NPL Site**

**(Operable Unit II)**

**3.0 Remedial Investigation (RI)**

**3.6 Remedial Investigation (RI) Reports**

1. "Preliminary Draft Remedial Investigation Report," NUS Corporation (November 1985).

**5.0 Record of Decision (ROD)**

**5.3 Responsiveness Summaries**

1. Cross Reference: "Response to Technical Comments Received Pursuant to the February 26, 1990 Order On Remand," EPA Region I (October 1, 1990) [Filed and cited as entry number 1 in 5.3 Responsiveness Summaries of the Administrative Record as supplemented for the December 29, 1983 ROD].
2. Cross Reference: "Response to Comments Submitted by Ropes & Gray and Craig and Macauley," EPA Region I (October 1, 1990) [Filed and cited as entry number 2 in 5.3 Responsiveness Summaries of the Administrative Record as supplemented for the December 29, 1983 ROD].

**5.4 Record of Decision (ROD)**

1. Cross Reference: Letter from Michael J. Lack, Lack & Sragow (Attorney for Charles George Sr., Charles George Land Reclamation Trust, and Charles George Trucking Company, Inc.) to David J. Dickerson, EPA Region I (August 2, 1990). Concerning transmittal of attached comments on the remedy [Filed and cited as entry number 1 in 5.4 Record of Decision (ROD) of the Administrative Record as supplemented for the December 29, 1983 ROD].
2. Cross Reference: Letter from Stephen Wald, Craig and Macauley (Attorney for James George and Charles George Jr.) and Laurence M. Johnson, Johnson & Schwartzman (Attorney for Charles George Jr.) to David J. Dickerson, EPA Region I (August 3, 1990) with attached August 1990 "Review of Superfund Records of Decision," Haley & Aldrich, Inc. Concerning comments on EPA response actions [Filed and cited as entry number 2 in 5.4 Record of Decision (ROD) of the Administrative Record as supplemented for the December 29, 1983 ROD].
3. Cross Reference: Letter from Thomas H. Hannigan Jr., Ropes & Gray (Attorney for "Certain New Defendants") to David J. Dickerson, EPA Region I (August 3, 1990) with attached August 3, 1990 "Technical Comments on Remedial Actions," Dames & Moore and GEI Consultants, Inc. and August 3, 1990 "Comments of Certain New Defendants on EPA's Remedial Action Decisions," Ropes & Gray. Concerning remand comments [Filed and cited as entry number 3 in 5.4 Record of Decision (ROD) of the Administrative Record as supplemented for the December 29, 1983 ROD].

## 6.0 Remedial Design (RD)

### 6.1 Correspondence

1. Memorandum from Steven P. Farrick, EPA Region I to Stephen Joyce, EPA Region I (November 5, 1987). Concerning design enforcement issues.
2. Memorandum from Jack Hoar, Camp Dresser & McKee, Inc. to David J. Dickerson, EPA Region I (September 7, 1989). Concerning response to comments on the adequacy of the synthetic membrane cap design.
- 3 2. Memorandum Report from Jack Hoar, Camp Dresser & McKee, Inc. to David J. Dickerson, EPA Region I (November 6, 1989). Concerning geomembrane and geotextile biaxial stress testing.
- 4 3. Letter from Guy Wm. Vaillancourt, E.C. Jordan Co. to David J. Dickerson, EPA Region I (November 28, 1989). Concerning comments on the biaxial stress tests on geomembrane and geotextile samples.
- 5 4. Memorandum from David J. Dickerson, EPA Region I to File (December 4, 1989). Concerning clarification of materials used in biaxial stress tests.
- 6 5. Letter from Steven Wald, Craig and Macauley (Attorney for James George and Charles George Jr.) to David J. Dickerson, EPA Region I (February 1, 1990). Concerning a request for an additional extension of time to submit written comments on landfill subsidence.
- 7 6. Letter from Dale C. Young, Commonwealth of Massachusetts Department of Environmental Protection to David J. Dickerson, EPA Region I (February 14, 1990). Concerning the Department of Environmental Protection's review of new information provided by EPA on landfill subsidence with the attached "Engineering Analysis of Proposed Design Changes for the Charles George Landfill Final Cover," HMM Associates, Inc. for Commonwealth of Massachusetts (October 1989).
- 8 7. Letter from RuthAnn Sherman, EPA Region I to Stephen Wald, Craig and Macauley (Attorney for James George and Charles George Jr.) (February 14, 1990). Concerning EPA's rejection of a request for an additional extension of time to submit written comments on landfill subsidence.
- 9 8. Letter from Thomas H. Hannigan Jr., Ropes & Gray (Attorney for Certain New Defendants) to David J. Dickerson, EPA Region I (February 15, 1990) with attached Letter from Joseph G. Engels and Steve J. Poulos, GEI Consultants, Inc. to Thomas H. Hannigan Jr., Ropes & Gray (Attorney for Certain New Defendants) (February 14, 1990). Concerning attached comments on landfill subsidence information.
- 10 9. Memorandum from Jack Hoar, Camp Dresser & McKee, Inc. to David J. Dickerson, EPA Region I (May 21, 1990). Concerning comments noted following review of "Comments on EPA Notice of Availability of Landfill Subsidence Information," GEI Consultants, Inc.
- 11 10. Letter from D. Collier Jackson and Gary W. Rhodes, Law Environmental, Inc. to Robert Zaruba, U.S. Army Corps of Engineers (June 1, 1990). Concerning well locations at the site.

### 6.4 Remedial Design Documents

1. "Draft Report: Compliance Oversight," PRC Engineering (November 26, 1986).
2. "Interim Technical Memorandum Evaluation of Charles George Landfill Settlement," E.C. Jordan Co. for EBASCO Services, Inc. (November 1988).



#### 6.4 Remedial Design Documents (cont'd.)

3. "Draft Technical Memorandum - Chemical Compatibility Evaluation of the Proposed Charles George Landfill Cover System," E.C. Jordan Co. for EBASCO Services, Inc. (March 1989).
4. "Technical Memorandum Evaluation of Charles George Landfill Subsidence," E.C. Jordan Co. for EBASCO Services, Inc. (September 1989).

#### 9.0 State Coordination

##### 9.3 State Contracts

1. Letter from Merrill S. Hohman, EPA Region I to Paul G. Keough, EPA Region I (November 22, 1989) with attached "Amendment #2 to the State Superfund Contract Between the Commonwealth of Massachusetts and the U.S. Environmental Protection Agency for Remedial Action" (December 7, 1989).

#### 10.0 Enforcement

##### 10.4 Interviews, Depositions, and Affidavits

1. Letter from Marvin D. Cutright, Cutright, Lilienthal & Powers, Inc. to John A. George, Remcor, Inc. (July 24, 1990). Concerning transmittal of the attached Deposition of John A. George, *United States v. Charles George Trucking Company, Inc. et al.*, Civil Action No. 85-2714-WD (July 19, 1990).
2. Letter from Marvin D. Cutright, Cutright, Lilienthal & Powers, Inc. to Paula M. Potoczak, U.S. Department of Justice (September 11, 1990). Concerning transmittal of the attached Revisions to the Deposition of John A. George, *United States v. Charles George Trucking Company, Inc. et al.*, Civil Action No. 85-2714-WD (August 3, 1990).
3. Letter from Deborah L. Fitzpatrick, Fritz & Sheehan Associates, Inc. to Paul B. Galvani, Ropes & Gray (Attorney for Certain New Defendants); Don Frankel, U.S. Department of Justice; RuthAnn Sherman, EPA Region I; Stephen Wald, Craig & Macauley (Attorney for James George and Charles George Jr.); and Ellen F. McCauley, Morrison, Mahoney & Miller (September 20, 1990). Concerning transmittal of the attached Deposition of John F. Hackler, *United States v. Charles George Trucking Company, Inc. et al.*, Civil Action No. 85-2714-WD (September 18, 1990).
4. Certificate Page and Errata Sheet for the Deposition of John F. Hackler, *United States v. Charles George Trucking Company, Inc. et al.*, Civil Action No. 85-2714-WD (November 13, 1990).
5. Deposition of Richard Thomas Leighton, *United States v. Charles George Trucking Company, Inc. et al.*, Civil Action No. 85-2463-WD and *Commonwealth of Massachusetts v. Charles George Trucking Company, Inc. et al.*, Civil Action No. 85-2714-WD.
6. Certificate Page and Errata Sheets for the Deposition of Richard Thomas Leighton, *United States v. Charles George Trucking Company, Inc. et al.*, Civil Action No. 85-2463-WD and *Commonwealth of Massachusetts v. Charles George Trucking Company, Inc. et al.*, Civil Action No. 85-2714-WD (October 31, 1990).

## 11.0 Site Management Records

### 11.7 PRP Steering Committee Documents

1. Letter from Daniel H. Squire, Skadden, Arps, Slate, Meagher & Flom for the PRP Steering Committee to Jamie W. Katz, EPA Region I (June 9, 1987).
2. Letter from Paul B. Galvani, Ropes & Gray (Attorney for Certain New Defendants) to E. Michael Thomas, EPA Region I (August 23, 1989).

## 13.0 Community Relations

### 13.3 News Clippings/Press Releases

#### News Clippings

1. "EPA Announces Availability of Landfill Subsidence Information," The Sun - Lowell, MA (December 18, 1989).
2. "EPA Announces Time Extension for Written Comments on Landfill Subsidence Information," The Sun - Lowell, MA (January 22, 1990).

#### Press Releases

3. "Announcement of Availability of Landfill Subsidence Information," Federal Register (Vol. 54 No. 249), December 29, 1989, page 53716.
4. "EPA Announces Availability of Landfill Subsidence Information," EPA Region I.
5. "EPA Announces Extension of Time to Submit Written Comments on Landfill Subsidence Information," EPA Region I.

### 13.4 Public Meetings

1. Cross Reference: Transcript, Public Meeting on the Order on Remand (May 23, 1990) [Filed and cited as entry number 2 in 13.4 Public Meetings of the Administrative Record as supplemented for the December 29, 1983 ROD].
2. Cross Reference: Transcript, Public Meeting on the Order on Remand (May 24, 1990) [Filed and cited as entry number 3 in 13.4 Public Meetings of the Administrative Record as supplemented for the December 29, 1983 ROD].
3. Cross Reference: Transcript, Public Meeting on the Order on Remand (May 31, 1990) [Filed and cited as entry number 4 in 13.4 Public Meetings of the Administrative Record as supplemented for the December 29, 1983 ROD].
4. Cross Reference: Transcript, Public Meeting on the Order on Remand (July 9, 1990) [Filed and cited as entry number 5 in 13.4 Public Meetings of the Administrative Record as supplemented for the December 29, 1983 ROD].

# Charles George Land Reclamation Trust Landfill

NPL Site  
Administrative Record  
(As supplemented pursuant to the  
February 26, 1990 Order on Remand)

Guidance Documents

Prepared for  
  
Region I  
Waste Management Division  
U.S. Environmental Protection Agency

## GUIDANCE DOCUMENTS

EPA guidance documents may be reviewed at EPA Region I, Boston, Massachusetts.

### General EPA Guidance Documents

1. Comprehensive Environmental Response, Compensation, and Liability Act of 1980, amended October 17, 1986. [C018]
2. Memorandum from Gene Lucero to the U.S. Environmental Protection Agency, August 28, 1985 (discussing community relations at Superfund Enforcement sites). [C053]
3. Memorandum from J. Winston Porter to Addressees ("Regional Administrators, Regions I-X; Regional Counsel, Regions I-X; Director, Waste Management Division, Regions I, IV, V, VII, and VIII; Director, Emergency and Remedial Response Division, Region II; Director, Hazardous Waste Management Division, Regions III and VI; Director, Toxics and Waste Management Division, Region IX; Director, Hazardous Waste Division, Region X; Environmental Services Division Directors, Region I, VI, and VII"), July 9, 1987 (discussing interim guidance on compliance with applicable or relevant and appropriate requirements). [C055]
4. "National Oil and Hazardous Substances Pollution Contingency Plan," Code of Federal Regulations (Title 40, Part 300), 1985. [C043]
5. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Community Relations in Superfund: A Handbook (Interim Version) (EPA/HW-6), September 1983. [C017]
6. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Draft Guidance on Remedial Actions for Contaminated Groundwater at Superfund Sites (OSWER Directive 9283.1-2), September 20, 1986. [C022]
7. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Handbook: Remedial Action at Waste Disposal Sites (EPA-625/6-82-006), June 1982 (Revised October 1985). [2309]
8. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Superfund Federal-Lead Remedial Project Management Handbook (EPA/540/G-87/001, OSWER Directive 9355.1-1), December 1986. [2010]
9. U.S. Environmental Protection Agency. Office of Emergency and Remedial Response. Superfund Public Health Evaluation Manual (OSWER Directive 9285.4-1), October 1986. [5014]
10. U.S. Environmental Protection Agency. Office of Ground-Water Protection. Ground-Water Protection Strategy, August 1984. [2403]
11. U.S. Environmental Protection Agency. Office of Research and Development, Office of Emergency and Remedial Response, and Office of Solid Waste and Emergency Response. Covers for Uncontrolled Hazardous Waste Sites (EPA-540/2-85-000), January 1985 (Revised September 1985). [2200]
12. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Data Quality Objectives for Remedial Response Activities: Development Process (EPA/540/G-87/003), March 1987. [2101]
13. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Guidance on Feasibility Studies under CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) (EPA/540/G-85/003), June 1985. [C034]

14. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Guidance on Remedial Investigations under CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) (EPA/540/G-85/002), June 1985. [C035]
15. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Interim Guidance on Superfund Selection of Remedy (OSWER Directive 9355.0-19), December 24, 1986. [9000]